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2 MERMELSTEIN LLP  
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7 811 Wilshire Boulevard, Suite 1460  
8 Los Angeles, California 90017  
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10 Attorneys for Ramandeep Girm  
11 and Rebecca Girm

12  
13 **UNITED STATES DISTRICT COURT**  
14 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**  
15 **SOUTHERN DIVISION**

16 In re

17 HIGHER GROUND EDUCATION INC.,

18 Debtor.

Case No. 8:25-cv-01319

Chapter 11

Adv. No. Assigned to Removed Action:

EXHIBITS 2-296 TO NOTICE OF  
REMOVAL OF LAWSUIT PENDING  
IN STATE COURT TO BANKRUPTCY  
COURT (28 USC § 1452)

HOLMES, ATHEY, COWAN & MERMELSTEIN LLP  
811 Wilshire Boulevard, Suite 1460  
Los Angeles, California 90017

1 Exhibits 2 through 296 are true and correct copies of pleadings filed in the  
 2 lawsuit entitled Barney v. Pieter, et al., Case No. 30-2018-01006531-CU-FR-CJC,  
 3 including all cross-actions and third party actions (the “Action”) formerly pending in  
 4 the Superior Court of the State of California, for the County of Orange, Central  
 5 Justice Center, 700 W. Civic Center Drive, Santa Ana, California 92701:

6 Exhibit 2: 2018.07.18 [Barney] Complaint

7 Exhibit 3: 2018.07.18 Notice of Related Case

8 Exhibit 4: 2018.08.07 [Lukas Pieter] Cross-Complaint

9 Exhibit 5: 2018.10.12 [All Parties] Stip and Protective Order

10 Exhibit 6: 2018.11.06 [Barney] First Amended Complaint

11 Exhibit 7: 2019.04.30 [Pieter] Demurrer to Amended Complaint

12 Exhibit 8: 2019.05.06 Amendment Re HGE as Doe 2

13 Exhibit 9: 2019.05.06 Amendment Re Ray as Doe 1

14 Exhibit 10: 2019.05.14 Declaration re Opp to Demurrer

15 Exhibit 11: 2019.05.28 Minute Order Re Demurrer

16 Exhibit 12: 2019.05.28 Notice of Ruling re Demurrer

17 Exhibit 13: 2019.06.14 Amendment re Rebecca as Doe 3

18 Exhibit 14: 2019.06.17 Second Amended Complaint

19 Exhibit 15: 2019.07.22 [LePort] Ntc of Demurrers to Pl Second Amended  
 20 Complaint

21 Exhibit 16: 2019.08.06 [Barney] Oppo to Peter Leport, et al Demurrers to Pls  
 22 Second Amended Complaint

23 Exhibit 17: 2019.08.12 [Peter LePort, et al] Reply ISO Demurrers to Portions  
 24 of Pls Second Amended Complaint

25 Exhibit 18: 2019.08.19 [Court] Minute Order re Demurrer to Amended  
 26 Complaint

27 Exhibit 19: 2019.08.21 [Girn] Declaration of Mark Mermelstein iso Motion to  
 28 Strike

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- 1 Exhibit 20: 2019.08.21 [Girn] Declaration of Mona S. Amer iso Motion to
- 2 Strike
- 3 Exhibit 21: 2019.08.21 [Girn] Defendants' Notice of Motion and Motion
- 4 Quash Summons and Motion to Strike
- 5 Exhibit 22: 2019.08.22 [Girn] MM Decl iso Motion for Advancement
- 6 Exhibit 23: 2019.08.22 [Girn] Motion for Advancement of Fees
- 7 Exhibit 24: 2019.08.22 [Girn] Motion to Strike Proof of Service
- 8 Exhibit 25: 2019.08.29 [Francisco Leport] Answer to Amended Complaint
- 9 Exhibit 26: 2019.08.29 [Monica Leport] Answer to Amended Complaint
- 10 Exhibit 27: 2019.08.29 [Peter Leport] Answer to Amended Complaint
- 11 Exhibit 28: 2019.09.05 [Girn, et al] Notice of Withdrawal of Motion
- 12 Exhibit 29: 2019.09.05 [Pieter] Amended Answer to Complaint
- 13 Exhibit 30: 2019.09.09 [Court] Minutes Order re Chambers Work
- 14 Exhibit 31: 2019.09.11 [Court] Minute Order re Chambers Work
- 15 Exhibit 32: 2019.09.11 [Girn, et al] Decl of Amer ISO Mot Quash Summons
- 16 and to Strike
- 17 Exhibit 33: 2019.09.11 [Girn, et al] Decl of Mermelstein ISO Mot for
- 18 Advancement of Fees
- 19 Exhibit 34: 2019.09.11 [Girn, et al] Decl of Mermelstein ISO Mot Quash
- 20 Summons and to Strike
- 21 Exhibit 35: 2019.09.11 [Girn, et al] Motion for Advancement of Fees and
- 22 Memo and Decl ISO
- 23 Exhibit 36: 2019.09.11 [Girn, et al] Motion to Quash Summons and Strike,
- 24 Memo and Decl ISO
- 25 Exhibit 37: 2019.09.18 [Court] Minute Order re Ex Parte Hearing
- 26 Exhibit 38: 2019.11.18 [Girn, et al] Reply ISO Mot for Advancement of Fees;
- 27 Decl of Mark Mermelstein in Support Thereof
- 28

1 Exhibit 39: 2019.11.18 [Girn, et al] Reply ISO Mot to Quash Summons and to  
 2 Strike  
 3 Exhibit 40: 2019.11.21 [Court] Minute Order w reassignment  
 4 Exhibit 41: 2019.11.21 [Court] Minute Order  
 5 Exhibit 42: 2019.12.10 [Court] Minute Order re Chambers Work  
 6 Exhibit 43: 2019.12.13 [Girn] NOM and Motion for Protective Order  
 7 Exhibit 44: 2019.12.13 [LePort] JZK Decl ISO Joinder and Motion for  
 8 Protective Order and Sanctions  
 9 Exhibit 45: 2019.12.13 [LePort] LePort Dfts\_ Joinder and Motion for  
 10 Protective Order and Sanctions  
 11 Exhibit 46: 2019.12.13 [LePort] LePort PO Granting Joinder and Motion for  
 12 Protective Order and Sanctions  
 13 Exhibit 47: 2019.12.13 [Lukas Pieter] Ntc of Joinder re Mot for Protective  
 14 Order  
 15 Exhibit 48: 2019.12.17 [Lukas Pieter] Part 2 of 3 of Joinder re Mot for  
 16 Protective Order  
 17 Exhibit 49: 2019.12.17 [Lukas Pieter] Part 3 of 3 of Joinder re Mot for  
 18 Protective Order  
 19 Exhibit 50: 2020.02.18 [Girn] Answer to Second Amended Complaint  
 20 Exhibit 51: 2020.02.18 [Girn] Cross-Complaint Against Barney and LEI  
 21 Exhibit 52: 2020.04.28 [Carl Barney, et al] Decl of Carl Barney ISO Special  
 22 MTS Cross-Complaint  
 23 Exhibit 53: 2020.04.28 [Carl Barney, et al] Decl of Jonathan D. Kent ISO  
 24 Special MTS Cross-Complaint  
 25 Exhibit 54: 2020.04.28 [Carl Barney, et al] Memo of Points and Authorities  
 26 ISO Cross-Def Special MTS Girns Cross-Complaint  
 27 Exhibit 55: 2020.05.21 [Court] Notice of Court Trial  
 28 Exhibit 56: 2020.07.21 [Girn, et al] Reply ISO Mot for Protective Order

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- 1 Exhibit 57: 2020.07.21 [LePort Dfts'] Joinder and Reply ISO Motion for
- 2 Protective Order and Sanctions
- 3 Exhibit 58: 2020.07.29 [LEI] Substitution of Attorney
- 4 Exhibit 59: 2020.08.05 [Barney] Decl Kent ISO Opp to Mtn for Protective
- 5 Order
- 6 Exhibit 60: 2020.08.05 [Barney] Opp to Mtn for Protective Order
- 7 Exhibit 61: 2020.08.06 [Girns] Opposition to Anti-SLAPP Motion
- 8 Exhibit 62: 2020.08.11 [Girn] 2nd Reply iso Motion for Protective Order
- 9 Exhibit 63: 2020.08.11 [LePort] Reply ISO Joinder and Motion for Protective
- 10 Order and Sanctions
- 11 Exhibit 64: 2020.08.11 [Pieter] Reply iso Motion for Protective Order
- 12 Exhibit 65: 2020.08.18 [Court] Minute Order re Ex Parte Application for
- 13 Leave to File Sur-Reply to Special MTS
- 14 Exhibit 66: 2020.08.19 [Court] Minute Order re Chambers Work
- 15 Exhibit 67: 2020.08.19 [Court] Minutes Finalized for Multiple Events
- 16 Exhibit 68: 2020.09.17 [Court] Minute Order re Allocation of Fees
- 17 Exhibit 69: 2020.09.17 [Court] Minute Order re OSC re Sanctions for
- 18 Plaintiff's Failure to Pay Filing Fees
- 19 Exhibit 70: 2020.09.17 [Court] Order re Appointment of Discovery Referee
- 20 Exhibit 71: 2020.09.18 [Girn] Supplemental Brief in Opposition to Plaintiff's
- 21 Special Motion To Strike
- 22 Exhibit 72: 2020.09.18 [Plaintiff] Supplemental Brief ISO Special Motion to
- 23 Strike
- 24 Exhibit 73: 2020.09.21 [Court] Minute Order re Nunc Pro Tunc Minutes
- 25 Exhibit 74: 2020.09.25 [Court] Minute Order re Anti-SLAPP motion
- 26 supplemental briefs
- 27 Exhibit 75: 2020.10.01 [Court] Minute Order re Order to Show Cause re
- 28 Sanctions

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- 1 Exhibit 76: 2020.10.01 [Court] Minute Order
- 2 Exhibit 77: 2020.10.15 [Barney] Answer to Girns' Cross-Complaint
- 3 Exhibit 78: 2020.11.03 [Court] Minutes Finalized for Ex Parte Application
- 4 Exhibit 79: 2020.11.16 [Court] Confid Protective Order
- 5 Exhibit 80: 2020.11.30 [Court] Minute Order
- 6 Exhibit 81: 2020.12.08 [LEI] Answer to Girn Cross-Complaint
- 7 Exhibit 82: 2020.12.08 [LEI] Answer to Unverified Cross-Complaint
- 8 Exhibit 83: 2021.02.17 [Girn, et al] Decl of Mark Mermelstein ISO Mot for
- 9 Summary Adjudication
- 10 Exhibit 84: 2021.02.17 [Girn, et al] Decl of Ramandeep Girn ISO Mot for
- 11 Summary Adjudication
- 12 Exhibit 85: 2021.02.17 [Girn, et al] Ntc of Mot for Summary Adjudication;
- 13 Memo of Points and Authorities, et al - Filed
- 14 Exhibit 86: 2021.02.17 [Girn, et al] Request for Judicial Ntc ISO Mot for
- 15 Summary Adjudication - Filed
- 16 Exhibit 87: 2021.02.17 [Girn, et al] Separate Statement of Undisputed Material
- 17 Facts ISO Mot for Summary Adjudication - Filed
- 18 Exhibit 88: 2021.02.26 [Court] Order Granting Ex Parte Application
- 19 Exhibit 89: 2021.04.20 [Court] Minute Order on Referee's Report
- 20 Exhibit 90: 2021.04.20 [Court] Signed Amended Referee Recommendation
- 21 Exhibit 91: 2021.05.07 [Girn] Notice and Motion for Leave to Amend Cross-
- 22 Complaint
- 23 Exhibit 92: 2021.05.28 [Court] Minute Order re Chambers Work
- 24 Exhibit 93: 2021.07.01 [Barney] Declaration of Jonathan D. Kent ISO Pltf's
- 25 Mtn to file Third Amended Complaint
- 26 Exhibit 94: 2021.07.01 [Barney] Memo of Ps and As for Mtn to File Third
- 27 Amended Complaint
- 28

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- 1 Exhibit 95: 2021.07.01 [Barney] Ntc of Mot and Motion for Leave to file Third
- 2 Amended Complaint
- 3 Exhibit 96: 2021.07.06 [Court] Minute Order re LEI and Barney Ex Parties
- 4 Exhibit 97: 2021.07.06 [Court] Notice of Case Reassignment to Lon F.
- 5 Hurwitz
- 6 Exhibit 98: 2021.07.06 [Court] Order re Ex Parte Motion to Shorten Time
- 7 Exhibit 99: 2021.08.05 [Girn] Decl of Francisco LePort iso Opposition to
- 8 Motion to File Third Amended Complaint
- 9 Exhibit 100: 2021.08.05 [Girn] Opposition to Barney Motion to File Third
- 10 Amended Complaint
- 11 Exhibit 101: 2021.08.11 [Barney] Reply iso Mtn for Leave to File Third
- 12 Amended Complaint
- 13 Exhibit 102: 2021.08.25 [Court] Order Granting Barney Motion for Leave to
- 14 File Third Amended Complaint
- 15 Exhibit 103: 2021.08.26 [Barney] Plaintiff's Third Amended Complaint
- 16 Exhibit 104: 2021.09.02 [JAMS Defendants] Joint Motion to Set Deadline for
- 17 Sanctions
- 18 Exhibit 105: 2021.09.09 [Barney] Opposition to Girns' Mtn for Leave to
- 19 Amend
- 20 Exhibit 106: 2021.09.09 [LEI] Opposition to Girns Mtn. for Leave to Amend
- 21 Cross-Complaint
- 22 Exhibit 107: 2021.09.10 [Barney] Opposition to Request to Amend Sanctions
- 23 Order
- 24 Exhibit 108: 2021.09.14 [Girn] Girn Dec iso Mtn for Summary Adjudication
- 25 Exhibit 109: 2021.09.14 [Girn] Mermelstein Dec iso Motion for Summary
- 26 Adjudication
- 27 Exhibit 110: 2021.09.14 [Girn] Notice of Motion and Motion for Summary
- 28 Adjudication



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- 1 Exhibit 111: 2021.09.14 [Girn] Notice of Partial Withdrawal of MSA
- 2 Exhibit 112: 2021.09.14 [Girn] Request for Judicial Notice iso MSA
- 3 Exhibit 113: 2021.09.14 [Girn] Sep Statement iso Motion for Summary
- 4 Adjudication
- 5 Exhibit 114: 2021.09.14 [Joint Motion] to Set deadline for Payment of
- 6 Sanctions
- 7 Exhibit 115: 2021.09.15 [Barney] Barney Decl. iso Opposition to MSA
- 8 Exhibit 116: 2021.09.15 [Barney] Evidentiary Objections
- 9 Exhibit 117: 2021.09.15 [Barney] Kent Decl. iso Opp to Girn MSA
- 10 Exhibit 118: 2021.09.15 [Barney] Opposition to Girn MSA
- 11 Exhibit 119: 2021.09.15 [Barney] Opposition to Sep. Stmt
- 12 Exhibit 120: 2021.09.15 [Court] Minute Order re Motion to Amend X-
- 13 Complaint Hearing Date
- 14 Exhibit 121: 2021.09.15 [Girn] Reply iso Motion for Leave to Amend Cross-
- 15 Complaint (conformed)
- 16 Exhibit 122: 2021.09.15 [LEI] Notice of Errata to Zar Decl
- 17 Exhibit 123: 2021.09.15 [LEI] Opposition to Girn MSA
- 18 Exhibit 124: 2021.09.15 [LEI] Opposition to Girn Sep Stmt
- 19 Exhibit 125: 2021.09.17 [Court] Order Granting Ex Parte App to Enlarge Page
- 20 Limit
- 21 Exhibit 126: 2021.09.24 [Girn] Girn Reply to Barney Opp to MSA
- 22 Exhibit 127: 2021.09.24 [Girn] Girn Reply to LEI Opp to MSA1
- 23 Exhibit 128: 2021.09.24 [Girn] Response to Barney Evidentiary Objections
- 24 Exhibit 129: 2021.09.24 [Girn] Supp Decl of MM iso Reply iso MSA
- 25 Exhibit 130: 2021.09.28 [Girn] Answer to Third Amended Complaint
- 26 Exhibit 131: 2021.09.28 [LePort] Francisco LePort's Answer to TAC
- 27 Exhibit 132: 2021.09.28 [LePort] Monica LePort's Answer to TAC
- 28 Exhibit 133: 2021.09.28 [LePort] Peter LePort's Answer to TAC



1 Exhibit 134: 2021.09.28 [Pieter] Answer to Third Amended Complaint  
2 Exhibit 135: 2021.09.29 [Court] Minute Order re MSA and Motion to Amend  
3 Exhibit 136: 2021.10.04 [Pieter] Notice of Entry of Judgment  
4 Exhibit 137: 2021.10.29 [Girn] Notice and Motion for Leave to Amend Cross-  
5 Complaint  
6 Exhibit 138: 2021.11.01 [Court] Order re Deadline for Payment of Sanctions-  
7 Second Amended Report and Recommendation (entered)  
8 Exhibit 139: 2021.11.10 [Girn] Notice of Ruling re Ex Parte App to Advance  
9 Hearing Date on Motion for Leave to Amend  
10 Exhibit 140: 2021.11.17 [Barney] Dec. Barney in Opp to Girn MSJ  
11 Exhibit 141: 2021.11.17 [Barney] Evidentiary Objections to MSJ  
12 Exhibit 142: 2021.11.17 [Barney] Miller Decl in Opp to Girn MSJ  
13 Exhibit 143: 2021.11.17 [Barney] Opposition to Girn MSA  
14 Exhibit 144: 2021.11.17 [Barney] Opposition to Separate Statement  
15 Exhibit 145: 2021.11.24 [Girn] Reply iso Motion for Summary Adjudication  
16 Exhibit 146: 2021.11.24 [Girn] Reply to Barney Separate Statement iso  
17 Opposition  
18 Exhibit 147: 2021.11.24 [Girn] Response to Objections to Girn Evidence  
19 Exhibit 148: 2021.12.01 [Court] Minute Order re Motion for Summary  
20 Adjudication  
21 Exhibit 149: 2021.12.08 [Court] Minute Order on Ex Parte re Out-of-State  
22 Commission  
23 Exhibit 150: 2021.12.13 [Barney] Bastian Decl iso Motion for Reconsideration  
24 Exhibit 151: 2021.12.13 [Barney] Kent Decl iso Motion for Reconsideration  
25 Exhibit 152: 2021.12.13 [Barney] Motion for Reconsideration  
26 Exhibit 153: 2021.12.13 [LEI] Substitution of Attorney -LEI-LMG signed  
27 Exhibit 154: 2021.12.14 [LEI] Motion for Joinder to Motion for  
28 Reconsideration

1 Exhibit 155: 2022.01.26 [HGE~Girn] Notice of Related Case  
2 Exhibit 156: 2022.03.03 [Barney] Opposition to Motion to Amend  
3 Exhibit 157: 2022.03.03 [LEI] Opp. to Mtn. for Leave to Amend X-Complaint  
4 Exhibit 158: 2022.03.08 [Esmond] Opposition to Girn Motion to Amend  
5 Exhibit 159: 2022.03.09 [Girn] Decl of Peter LePort re LEI counsel  
6 Exhibit 160: 2022.03.09 [Girn] Reply iso Motion for Leave to Amend  
7 Exhibit 161: 2022.03.09 [Girn] Reply to Esmond iso Motion for Leave to  
8 Amend  
9 Exhibit 162: 2022.03.09 [Girn] Reply to LEI iso Motion for Leave to Amend  
10 Exhibit 163: 2022.03.17 [Girn] First Amended Cross-Complaint  
11 Exhibit 164: 2022.03.17 [Girn] Notice of Ruling re Motion to Amend X-  
12 Complaint  
13 Exhibit 165: 2022.04.14 [Girn] Opposition to Motion for Reconsideration  
14 Exhibit 166: 2022.04.20 [Barney] Reply to Opp. to MFR  
15 Exhibit 167: 2022.04.20 [Barney] Supp. Schmidt Declaration ISO Reply  
16 Exhibit 168: 2022.04.20 [LEI] Answer to FACC  
17 Exhibit 169: 2022.04.20 [LEI] Reply to Opp. to Mtn for Recon  
18 Exhibit 170: 2022.04.26 [Court] Minute Order re Motion for Reconsideration  
19 Exhibit 171: 2022.04.27 [Barney] Demurrer re FACC  
20 Exhibit 172: 2022.04.27 [Barney] Motion to Strike re FACC  
21 Exhibit 173: 2022.04.27 [Barney] RJN iso Demurrer to FACC  
22 Exhibit 174: 2022.04.27 [Barney] RJN iso Motion to Strike  
23 Exhibit 175: 2022.04.28 [Girn] MM Decl re Motion to Strike  
24 Exhibit 176: 2022.05.02 [Juhlin and Miller] Joinder to Demurrer and Motion  
25 to Strike  
26 Exhibit 177: 2022.05.05 [Esmond] Decl of EZC iso Demurrer to FACC  
27 Exhibit 178: 2022.05.05 [Esmond] Demurrer to FACC  
28 Exhibit 179: 2022.05.05 [Esmond] Motion to Strike FACC

1 Exhibit 180: 2022.05.12 [Court] Minute Order  
2 Exhibit 181: 2022.05.16 [Court] Minute Order re Status Conference  
3 Exhibit 182: 2022.06.02 [Court] Minute Order re Discovery Referee  
4 Exhibit 183: 2022.07.06 [Court] Minute Order on Motion for Reconsideration  
5 Exhibit 184: 2022.08.31 [Girn] Opposition to Demurrer  
6 Exhibit 185: 2022.08.31 [Girn] Opposition to Motion to Strike  
7 Exhibit 186: 2022.09.08 [Girn] Opposition to Esmond Demurrer  
8 Exhibit 187: 2022.09.08 [Girn] Opposition to Esmond Motion to Strike  
9 Exhibit 188: 2022.09.14 [Court] Minute Order  
10 Exhibit 189: 2022.10.04 [Girn] Memo of Ps and As for Leave to Amend  
11 Cross-Complaint  
12 Exhibit 190: 2022.10.04 [Girn] MM Decl iso Motion for Leave to Amend  
13 Cross-Complaint  
14 Exhibit 191: 2022.10.04 [Girn] Notice of Motion for Leave to Amend Cross-  
15 Complaint  
16 Exhibit 192: 2022.10.13 [Barney] Dreger Decl iso Opp to Defendants' Motion  
17 for Leave  
18 Exhibit 193: 2022.10.13 [Barney] Opposition to Defendants' Motion for Leave  
19 to Amend Cross-Complaint  
20 Exhibit 194: 2022.10.13 [Barney] RJN iso Opp to Defendants' Motion for  
21 Leave  
22 Exhibit 195: 2022.10.19 [Girn] Reply iso Motion for Leave to Amend Cross-  
23 Complaint  
24 Exhibit 196: 2022.10.26 [Court] Minute Order  
25 Exhibit 197: 2022.10.31 [Girn] Notice of Ruling on Motion for Leave to  
26 Amend  
27 Exhibit 198: 2022.10.31 [Girn] Second Amended Cross-Complaint  
28 Exhibit 199: 2022.11.16 [Defendants] Motion for Protective Order

1 Exhibit 200: 2022.11.23 [Barney and LEI] Declaration of Schmidt ISO Joint  
2 Opposition to Joint Motion for Protective Order  
3 Exhibit 201: 2022.11.23 [Barney and LEI] Joint Opposition to Joint Motion for  
4 Protective Order  
5 Exhibit 202: 2022.11.30 [Defendants] Reply iso Motion for Protective Order  
6 Exhibit 203: 2022.12.02 [Barney et al] Demurrer to SACC  
7 Exhibit 204: 2022.12.02 [Barney et al] Motion to Strike SACC  
8 Exhibit 205: 2022.12.02 [Barney et al] Request for Judicial Notice ISO  
9 Demurrer to SACC  
10 Exhibit 206: 2022.12.05 [LEI] Motion to Strike Arguments in Reply iso  
11 Motion for Protective Order  
12 Exhibit 207: 2022.12.05 [LEI] Schmidt Decl iso Motion to Strike Arguments  
13 in Reply  
14 Exhibit 208: 2022.12.07 [Defendants] Joint Opp to Motion to Strike re MPO  
15 Exhibit 209: 2022.12.09 [Barney] Reply to Opp. to Joint Motion to Strike  
16 Arguments in Reply  
17 Exhibit 210: 2023.02.07 [MBK Chapman] Ntc of Mtn and Mtn. to Be Relieved  
18 as Counsel  
19 Exhibit 211: 2023.04.14 [Girn] Opposition to Barney Ds Demurrer to SACC  
20 Exhibit 212: 2023.04.14 [Girn] Opposition to Motion to Strike SACC  
21 Exhibit 213: 2023.04.20 [Barney] Reply to Opp. to Demurrer to SACC  
22 Exhibit 214: 2023.04.20 [Barney] Reply to Opp. to MTS SACC  
23 Exhibit 215: 2023.04.21 [Barney] Decl. of J. Schmidt ISO Opp. to Motion for  
24 Leave to Intervene in SACC  
25 Exhibit 216: 2023.04.21 [Barney] Opposition to Motion for Leave to Intervene  
26 in SACC  
27 Exhibit 217: 2023.04.27 [Girn] Reply iso Motion for Leave to Intervene in  
28 SACC

1 Exhibit 218: 2023.05.05 [Court] Minute Order re Motion to Intervene  
2 Exhibit 219: 2023.05.05 [Girn] Notice of Ruling  
3 Exhibit 220: 2023.07.20 [Court] Minute Order re Motions Hearing  
4 Exhibit 221: 2023.07.21 [Court] Minute Order on Barney Demurrer  
5 Exhibit 222: 2023.07.21 [Court] Order Granting Attorneys Motion to Be  
6 Relieved as Counsel  
7 Exhibit 223: 2023.07.27 [Barney] Notice of Ruling on Demurrer and MTS  
8 SACC  
9 Exhibit 224: 2023.07.31 [Girn] Third Amended Cross-Complaint  
10 Exhibit 225: 2023.09.01 [Barney LEI] Demurrer to TACC  
11 Exhibit 226: 2023.09.01 [Barney LEI] Motion to Strike Portions of TACC  
12 Exhibit 227: 2023.09.01 [Barney LEI] RJN ISO Demurrer to TAC  
13 Exhibit 228: 2023.09.01 [Barney] Declaration of Schmidt ISO Opp. to Girns'  
14 MTC  
15 Exhibit 229: 2023.09.07 [Robinson et al] Notice of Appearance re LEI  
16 Exhibit 230: 2023.10.02 [Court] Minute Order re LEI representation  
17 Exhibit 231: 2024.01.02 [LEI] Notice of Appearance by Law Office of Lou  
18 Shoch  
19 Exhibit 232: 2024.01.02 [LEI] Notice of Withdrawal of Demurrer  
20 Exhibit 233: 2024.01.05 [Court] Minute Order Denying Ex Parte  
21 Exhibit 234: 2024.01.05 [Robinson Firm] Notice of Non-Withdrawal and  
22 Objection  
23 Exhibit 235: 2024.01.11 [Girn] Opposition to Barney Ds Demurrer to TACC  
24 Exhibit 236: 2024.01.11 [Girn] Opposition to LEI Demurrer to TACC  
25 Exhibit 237: 2024.01.11 [Girn] Opposition to Motion to Strike TACC  
26 Exhibit 238: 2024.01.11 [Girn] Request for Judicial Notice iso Opposition to  
27 Demurrer to TACC  
28

1 Exhibit 239: 2024.01.17 [Barney RR] Declaration of Kelli Dreger ISO Ex  
2 Parte with Exhibits  
3 Exhibit 240: 2024.01.17 [Barney] Motion for Preliminary Injunction  
4 Exhibit 241: 2024.01.18 [Barney LEI] Reply ISO Demurrer to TACC  
5 Exhibit 242: 2024.01.18 [Barney LEI] Reply ISO MTStrike  
6 Exhibit 243: 2024.01.23 [Girn] Notice of Withdrawal of Opposition to LEI  
7 Demurrer  
8 Exhibit 244: 2024.01.24 [Robinson Firm] Joinder in Preliminary Injunction  
9 Exhibit 245: 2024.03.01 [Court] Minute Order re Referee Reports  
10 Exhibit 246: 2024.05.03 [Girn] Opposition to Barney Motion for Preliminary  
11 Injunction  
12 Exhibit 247: 2024.05.03 [LEI] Notice of Joinder to Opposition to PI Motion  
13 Exhibit 248: 2024.05.03 [LePort] Joinder to Opposition to Motion for  
14 Preliminary Injunction  
15 Exhibit 249: 2024.05.09 [Barney] Reply ISO Motion for Preliminary  
16 Injunction  
17 Exhibit 250: 2024.05.09 [Robinson] LEI Joinder in Barney Reply re  
18 Preliminary Injunction  
19 Exhibit 251: 2024.05.16 [Court] Minute Order re Continuance of Motion for  
20 Prelim Injunction  
21 Exhibit 252: 2024.06.28 [Court] Minute Order  
22 Exhibit 253: 2024.07.02 [Girn] Request for Statement of Decision re  
23 Sustaining Demurrer  
24 Exhibit 254: 2024.07.08 [Barney] Notice of Ruling re Motion for Prelim  
25 Injunction and Demurrer and Undertaking  
26 Exhibit 255: 2024.07.10 [Barney et al] Cross Defendants' Answer to TACC  
27 Exhibit 256: 2024.07.10 [Robinson Firm] Answer to TACC  
28 Exhibit 257: 2024.07.19 [Court] Minute Order re Demurrer Ruling

1 Exhibit 258: 2024.08.05 [Girn] Compendium of Evidence FINAL  
2 Exhibit 259: 2024.08.05 [Girn] MSA re Barney COAs 1-4 8-11 FINAL  
3 Exhibit 260: 2024.08.05 [Girn] MSA Separate Statement COAs 1-4 8-11  
4 Exhibit 261: 2024.10.10 [Barney] Compendium of Evidence  
5 Exhibit 262: 2024.10.10 [Barney] Evidentiary Objections  
6 Exhibit 263: 2024.10.10 [Barney] Opp. to Girns' Motion for Summary  
7 Adjudication  
8 Exhibit 264: 2024.10.10 [Barney] Opposition to Girns' Separate Statement  
9 Exhibit 265: 2024.10.15 [Court] Order Granting Trial Date Extension  
10 Exhibit 266: 2024.10.18 [Girn] Evidentiary Objections to Barney Decl  
11 Exhibit 267: 2024.10.18 [Girn] Opp to Barney Separate Statement  
12 Exhibit 268: 2024.10.18 [Girn] Reply iso MSA  
13 Exhibit 269: 2024.10.18 [Girn] Response to Barney Evidentiary Objections to  
14 MSA  
15 Exhibit 270: 2024.10.25 [Court] Minute Order re Girn MSA  
16 Exhibit 271: 2024.11.08 [Barney] Declaration of J. Schmidt iso MJP  
17 Exhibit 272: 2024.11.08 [Barney] Notice of Motion and Motion for Judgment  
18 on the Pleadings  
19 Exhibit 273: 2024.11.08 [Barney] Request for Judicial Notice iso MJP  
20 Exhibit 274: 2024.11.20 [Barney] Declaration of Counsel ISO Pltf's Motion to  
21 File Supplemental Complaint  
22 Exhibit 275: 2024.11.20 [Barney] MPA re Mtn for Leave to File Supp  
23 Complaint  
24 Exhibit 276: 2024.11.20 [Barney] Ntc of Motion and Motion for Leave to file  
25 Supplemental Complaint  
26 Exhibit 277: 2025.03.05 [HACM] Decl iso Motion to Withdraw as Counsel to  
27 HGE  
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1 Exhibit 278: 2025.03.05 [HACM] Notice and Motion to Be Relieved as  
2 Counsel for HGE  
3 Exhibit 279: 2025.03.18 [Court] Minute Order Continuing Trial Date  
4 Exhibit 280: 2025.03.20 [Girn] Opposition to Motion for Judgment on the  
5 Pleadings  
6 Exhibit 281: 2025.03.20 [LePorts] Opposition to Motion for Leave to File  
7 Supplemental Complaint  
8 Exhibit 282: 2025.03.26 [Barney] Reply to Motion for Leave to File  
9 Supplemental Complaint  
10 Exhibit 283: 2025.03.26 [Barney] Reply to Opposition to Motion for Judgment  
11 on the Pleadings  
12 Exhibit 284: 2025.04.01 [Barney] Ntc of Withdrawal of Motion for Leave to  
13 file Supplemental Complaint  
14 Exhibit 285: 2025.04.03 [HACM] Order Granting Motion to Be Relieved as  
15 Counsel to HGE  
16 Exhibit 286: 2025.04.10 [Court] Minute Order Denying Motion for Judgment  
17 on the Pleadings  
18 Exhibit 287: 2025.04.10 [Court] SIGNED Order Granting Motion to Be  
19 Relieved as Counsel  
20 Exhibit 288: 2025.04.14 [Girn] Notice of Ruling on Motion for Judgment on  
21 the Pleadings  
22 Exhibit 289: 2025.04.22 [Court] Minute Order re Discovery Referee Reports  
23 Exhibit 290: 2025.04.25 [Court] Minute Order re HGE  
24 Exhibit 291: 2025.05.08 [Court] Minute Order  
25 Exhibit 292: 2025.05.09 [Court] Minute Order re Bifurcation  
26 Exhibit 293: 2025.05.12 [Court] Minute Order re Continued Trial Date  
27 Exhibit 294: 2025.05.16 [Court] Minute Order re Discovery Motion  
28 Exhibit 295: 2025.05.27 [Court] Minute Order re OSC

1 Exhibit 296: 2025.05.29 [HGE] Notice of Appearance for HGE  
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3 Dated: June 19, 2025

HOLMES, ATHEY, COWAN &  
4 MERMELSTEIN, LLP

5 By: /s/ Mark Mermelstein

6 MARK MERMELSTEIN  
7 Attorneys for Ramandeep Girm and  
8 Rebecca Girm  
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